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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

-against-

WELLS FARGO BANK, N.A.,

Defendant.

12 Civ. 7527 (JMF)(JCF)

**NOTICE OF MOTION OF THE
UNITED STATES OF AMERICA
TO AMEND ITS COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Sarah J. North and the exhibits appended thereto, the accompanying Memorandum of Law, and all prior papers and proceedings herein, plaintiff the United States of America will move this Court, before the Honorable Jesse M. Furman, at the United States Courthouse, 40 Foley Square, Courtroom 1105, New York, New York 10007, at a date and time to be determined by the Court, for an order granting it leave to file a second amended complaint to join Kurt Lofrano as a party defendant, pursuant to Federal Rules of Civil Procedure 15(a)(2) and 21, and for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Order dated November 14, 2013, opposition papers must be served on or before December 2, 2013, and reply papers must be served on or before December 6, 2013.

Dated: New York, New York
November 22, 2013

PREET BHARARA
United States Attorney for the
Southern District of New York
Attorney for the United States of America

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